## UNITED STATES DISTRICT COURT

## DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)
	)
v.	) CRIMINAL NO. 1:22CR10271
	)
CATHERINE LEAVY	)

## MOTION TO FILE EXHIBITS UNDER SEAL

The defendant, Ms. Catherine Leavy, requests leave to file exhibits to her sentencing memorandum, which contain sensitive HIPPA related medical and psychological information, under seal. As grounds, Ms. Leavy states that these exhibits consist of evaluations by LICSW, LICD-1 Sarah Coughlin and contain sensitive and confidential medical, psychological, and psychiatric information. As such, Ms. Leavy requests that these exhibits be filed under seal.

Respectfully submitted,

Ms. Catherine Leavy, By Her Attorney,

/s/ Forest O'Neill-Greenberg
Forest O'Neill-Greenberg
BBO # 674760
Federal Public Defender Office
51 Sleeper Street, 5<sup>th</sup> Floor
Boston, MA 02210
Tel: 617-223-8061

## **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 13, 2024.

/s/ Forest O'Neill-Greenberg
Forest O'Neill-Greenberg